STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

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July 28, 2004

Mr. Brian Helland
Code 1811/BH
Department of the Navy,
Engineering Field Activity-Northeast
Naval Facilities Engineering Command
10 Industrial Highway, Mail 82
Lester, PA 19113

Re: Old Navy Fuel Farm, Monitoring Report-September 2003
Naval Air Station, Brunswick

Dear Mr. Helland:

The Maine Department of Environmental Protection (MEDEP) has reviewed the Navy's Response to Comments (RTC) dated May 6, 2004 for the Groundwater Monitoring Report for the September 2003 Event at the Old Navy Fuel Farm (March 2004), prepared by EA Engineering, Science and Technology. Based on that review MEDEP has one follow up comment.

5. Section 3.1, Water Level Gauging Program, p. 8, 2nd paragraph:

"A tar-like substance was observed in the well protective casing and on the outside of the polyvinyl chloride riser of MW-NASB-208R, possibly resulting from the recent paving activities around this well."

MEDEP Comment: MEDEP strongly recommends that the Navy needs to thoroughly investigate the situation described above to determine if the paving is responsible. The quantity of the substance in the annulus between the two casings, including its length along the riser, should be determined. The above description would suggest that the well construction has been compromised, as the protective well casing protrudes about 2 feet above the ground surface according to Table 2. If compromised, the elevated DRO found at this well (505 µg/L) may not be representative of in-situ contamination if the substance is entering the well. Other evidence of abnormality to consider regarding MW-NASB-208B include: (1) the well has the deepest well screen in the current monitoring network at the fuel farm, (2) the specific conductance of sampled water in September 2003 is very low (45 µmhos/cm) and resembles surface water runoff, and (3) the turbidity of purged water was 82 NTUs.

Interestingly, MW-NASB-208R is located about midway on a line that runs east-southeast from MW-NASB-098 to MW-NASB-245, both of which still have DRO detections (35 and 48 µg/L, respectively). Perhaps not coincidentally, this orientation is the same as that mapped for groundwater flow. (RR)

The Navy must also resolve the contradictory information regarding the MW-NASB-208R well construction. (See comment 8 below) (RR)

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Navy's Response—The actual situation at this well was not accurately noted in the report. The tar-like substance was present on the exterior of the PVC well casing, and there was residue on the apron of the roadbox in which the well is located. This substance is at the ground surface, and was not present before paving activities. Therefore, it is a reasonable conclusion that this is the result of the recent paving activities. To clarify this issue, the sentence in Section 3.1, Water Level Gauging Program, Page 8, 2nd paragraph, 1st sentence, will be revised to clarify the surface completion of well MW-208AR. The sentence will be revised as follows:

A tar-like substance was observed inside ~~the well protective casing~~ the apron of the roadbox and on the outside of the polyvinyl chloride riser of MW-NASB-208AR, possibly resulting from the ~~recent~~ paving activities around this well.

MEDEP Follow-up Comment: The Navy's response would suggest that the tar-like substance may not have entered the PVC well riser, and that the integrity of MW-NASB-208AR was not compromised. However, the question of whether the measured DRO groundwater concentration of 505 µg/L was due to the paving activities was not answered. The Navy's response to MEDEP's Comment 6 states that MW-NASB-208 AR was decommissioned and a new well (MW-NASB-208BR) was installed. In the April 22, 2004 letter report on new well constructions at the Old Fuel Farm, the Navy stated "In addition, one existing monitoring well (MW-NASB-208AR) was decommissioned and replaced since it was damaged during construction activities in the area of Building 151." Inspection of the DRO graph for the MW-NASB-208 (2000-2003) indicates that DRO concentrations for spring and fall of 2003 show a significant rise. No other monitoring well at the Old Fuel Farm showed a significant rise in 2003. Therefore a qualifier should added to the trend graph in Appendix A (page 13) and Table 1. A decision on whether the data from this well is accurate or erroneous will need to be made upon review of the spring 2004 data.

If you have any questions or comments please call me at (207) 287-7713 or email me at claudia.b.sait@maine.gov.

Respectfully,

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